

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE SOUTHERN DISTRICT OF TEXAS

3 HOUSTON DIVISION

4 UNITED STATES OF AMERICA § CASE NO. 4:23-MJ-1417-1

§ HOUSTON, TEXAS

5 VERSUS §

§ TUESDAY,

§ JULY 18, 2023

6 ANDREW VENEGAS

§ 10:01 A.M. TO 11:28 A.M.

7 **PRELIMINARY EXAM AND DETENTION HEARING**

8 BEFORE THE HONORABLE CHRISTINA BRYAN

9 UNITED STATES MAGISTRATE JUDGE

10  
11 APPEARANCES: SEE NEXT PAGE

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ALL EXHIBITS ORDERED SEALED

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1           **HOUSTON, TEXAS; TUESDAY, JULY 18, 2023; 10:01 A.M.**

2           THE COURT: The case is *United States of America*  
3 *versus Andrew Venegas*. We're set for preliminary and  
4 detention hearing. But before we do that, I need to give  
5 the oral *Brady* order.

6           Under Rule 5(f), counsel for the United States is  
7 ordered to comply with its disclosure obligations under  
8 *Brady versus Maryland* and its progeny. The failure to do so  
9 may result in the dismissal of charges, exclusion of  
10 evidence, adverse jury instructions, contempt proceedings,  
11 and sanctions.

12           All right, counsel, are we all going forward with  
13 the preliminary and detention hearing today?

14           MR. BATARSE: Your Honor, good morning. Luis  
15 Batarse for the United States. I had spoken to defense  
16 yesterday. I'm not sure if we're doing the PC hearing or  
17 both. But we're ready.

18           THE COURT: All right.

19           MR. DOYLE: We -- good morning, Your Honor. Paul  
20 Doyle and Trevor Sharon for Mr. Venegas. We intend to waive  
21 the probable cause hearing and just move --

22           THE COURT: And just move forward with detention.

23           MR. DOYLE: Correct.

24           THE COURT: Okay. Great. Give me one moment to  
25 get my computer up and running.

1           Mr. Batarse, if you want to go ahead and get your  
2 witness on the stand while I'm doing this, we can --

3           MR. BATARSE: Yes, Your Honor.

4           THE COURT: -- swear the witness.

5           And the basis for your motion for detention is 31 --

6           MR. BATARSE: It's a 3142(e)(3)(E). It's a  
7 presumption because it's a sexual exploitation of a child  
8 case that no condition or combination of conditions can  
9 assure -- reasonably assure the Defendant's appearance or  
10 the safety of the community.

11          THE COURT: So that's an enumerated offense so  
12 it's under -- your motion's under 3142(f)(1).

13          MR. BATARSE: It is under --

14          THE COURT: F-1 and then the --

15          MR. BATARSE: It's one of the "E," three, "E,"  
16 Your Honor, I believe that --

17          THE COURT: I think that's where the presumption  
18 is. But there -- the motions are either under 3142(f)(1) or  
19 (f)(2); (f)(1) is --

20          MR. BATARSE: Yes, it's (f)(1), Your Honor.

21          THE COURT: -- for the enumerated offenses.

22          MR. BATARSE: Yes, Your Honor.

23          THE COURT: All right.

24          THE CLERK: Ma'am, raise your right hand.

25          TANISHA CAMPBELL, GOVERNMENT'S WITNESS, SWORN

1 THE COURT: This extra security really slows me  
2 down.

3 All right, Mr. Batarse, you may proceed.

4 MR. BATARSE: Yes, Your Honor. United States  
5 calls FBI Special Agent Tanisha Campbell to testify. I  
6 believe she's already been sworn in. Just making sure that  
7 was on the record, Your Honor.

8 THE COURT: We did get that on the record,  
9 correct, Gabby? All right, thank you.

10 MR. BATARSE: Okay.

11 DIRECT EXAMINATION

12 BY MR. BATARSE:

13 Q Agent Campbell, can you please introduce yourself to  
14 the Court?

15 A My name is Tanisha Campbell. I'm a special agent for  
16 the FBI.

17 Q And how long have you worked for FBI?

18 A I've worked for the FBI for four years.

19 Q Tell us a bit -- a little bit about your duties for  
20 FBI, training, things like that.

21 A As an FBI agent, my duties are to investigate crimes,  
22 in particular probably for about a year and a half I worked  
23 counterterrorism, and for the remainder of those years I've  
24 been working violent crimes against children.

25 Q So approximately how many years, two years?

1 A Two years.

2 Q Okay. Tell us about some of your duties in your job  
3 investigating violent crimes against children.

4 A Some of my duties are checking various websites for  
5 content that might involve child pornography, sending off  
6 subpoenas to get information on different subscribers. I  
7 serve search warrants. And I investigate numerous other  
8 crimes that involve children, kidnappings, parental  
9 kidnappings.

10 Q Okay. Do you also investigate sexual -- the offense of  
11 sexual exploitation of children?

12 A Yes.

13 Q Is that also known as production of child pornography?

14 A Yes.

15 Q How about receipt, distribution, advertising,  
16 possession, offenses like that?

17 A Yes.

18 Q Okay. Regarding the current investigation, are you the  
19 case agent in FBI Houston for the current Defendant?

20 A Yes.

21 Q And what's his name?

22 A Andrew Venegas.

23 Q Okay. And how was this investigation brought to your  
24 attention?

25 A The investigation was brought to my attention by a law

1 enforcement officer in Virginia. They were doing an ongoing  
2 investigation on an online moniker known -- it's a Telegram  
3 application. The online moniker was known as Starkylol.  
4 And later we discovered that that was the Defendant, Andrew  
5 Venegas.

6 Q Okay. So the -- is the investigation is from another  
7 FBI office?

8 A Yes.

9 Q Okay. Is that other investigation ongoing?

10 A Yes.

11 Q And what -- was that investigation related to websites  
12 that publish material that's been illicitly obtained?

13 A Yes.

14 Q Are there numerous websites that publish that type of  
15 material?

16 A Not numerous but in particular that one in particular  
17 was producing numerous content.

18 Q Okay. So during the investigation, as you just  
19 mentioned, FBI Virginia came across the moniker Starkylol.

20 A Yes.

21 Q And what is it that drew the attention of FBI to this  
22 particular user?

23 A This particular user that they saw was uploading  
24 content that involved adults and minors and, you know,  
25 pornography content, --



1 Q Okay.

2 A -- pornographic content, excuse me.

3 Q All right. And so when we're saying pornographic  
4 content, are we just merely saying pornography or is there  
5 another element of stealing or taking or extortion that's  
6 going along with it as well?

7 A That's correct.

8 Q Can you explain that to the Court?

9 A Yeah. So there was material being stolen from these  
10 women's social media pages and they were used to extort and  
11 blackmail them for additional photographs or images,  
12 photographs, images, or any type of videos.

13 Q Okay. You mentioned Telegram, correct?

14 A Correct.

15 Q What is Telegram?

16 A So Telegram is a mobile application that you can use on  
17 a mobile phone or a desktop. You can also sync Telegram  
18 with all other devices that you might have, tablets,  
19 cellphones. You could sync one account. It's used  
20 primarily for messages, videos, documents. You can upload  
21 documents. You can also broadcast your own channel for over  
22 200 and thousand subscribers so people can subscribe to you.  
23 Q Okay. So you can create a channel as a user that other  
24 people can observe.

25 A Correct.

1 Q Kind of like a Facebook wall, like people can read  
2 what's on the channel.

3 A Correct.

4 Q Okay. And are you able to select what's public and  
5 what's private on Telegram?

6 A Yes.

7 Q Okay. And what is one of the benefits of using an  
8 application or program like Telegram?

9 A A lot of these applications can be encrypted so that's  
10 one of the benefits to it.

11 Q Why would somebody care if an application, you know,  
12 where you're publicly posting information is encrypted or  
13 not?

14 A Mainly because they don't want certain content to get  
15 out or known it to come from their Telegram wall or  
16 application.

17 Q Okay. So does -- so Telegram, specifically you  
18 mentioned encrypted. Does that make it more difficult for  
19 law enforcement to determine who is maybe posting a  
20 particular type of content?

21 A Correct.

22 Q Okay. And the people who utilize these types of  
23 programs are aware of such things generally, correct?

24 A Correct.

25 Q Okay. When we're talking about -- so we're -- you

1 talked about Telegram. And there's also websites that  
2 publish material that has been obtained through extortion or  
3 blackmail or some other means.

4 A Yes.

5 Q Okay. So during the investigation did FBI review  
6 content from these different places online?

7 A Yes.

8 Q Okay. And you mentioned that they came across  
9 Starkylol.

10 A Correct.

11 Q And I'm going to fast forward just so that there's no  
12 confusion about what we're discussing. Did FBI execute a  
13 search warrant on the Defendant's residence last week?

14 A Yes.

15 Q And just to be clear for the record, do you see Andrew  
16 Venegas sitting in the courtroom today?

17 A Yes.

18 Q Okay. Could you please identify him by an article of  
19 clothing that he's wearing?

20 A He's wearing green.

21 Q Green.

22 MR. BATARSE: May the record reflect that the  
23 agent has identified the Defendant?

24 THE COURT: Yes, so noted.

25 MR. BATARSE: Okay.

1 BY MR. BATARSE:

2 Q And so last week did FBI execute a search warrant at  
3 his residence?

4 A Yes.

5 Q And during the execution of the search warrant was a  
6 phone located inside of the residence?

7 A Yes.

8 Q And was it determined that the phone belonged to this  
9 Defendant?

10 A Yes.

11 Q Okay. And while the FBI was present, were -- was that  
12 phone receiving messages?

13 A Yes, that's correct.

14 Q Okay. So without going into the phone, FBI agents were  
15 able to see that it was receiving messages.

16 A That's correct.

17 Q Okay. And did FBI in fact using an undercover account  
18 send a message to the user Starkylol while they were in --  
19 while FBI agents were present in the search warrant?

20 A Yes.

21 Q Okay. And did that phone actually receive the message  
22 that was sent?

23 A Yes.

24 Q Okay. Also, in order to get the warrant, we won't go  
25 into all the details, but did FBI do extensive digital

1 forensic digital investigation to link Starkylol, other  
2 accounts to this particular Defendant, Andrew Venegas?

3 A Yes.

4 Q And that was corroborated by the execution of the  
5 search warrant; is that correct?

6 A That's correct.

7 Q And were other electronic devices seized during that  
8 search warrant?

9 A Yes.

10 Q One in particular, has that recently been -- is one of  
11 them currently under review?

12 A Yes.

13 Q Did that one also contain material by Starkylol A-K-A  
14 Andrew Venegas?

15 A Yes.

16 MR. BATARSE: Okay. So I just want to clarify  
17 that for the beginning.

18 Q And is the investigation into this Defendant still  
19 ongoing?

20 A Yes.

21 Q The electronic devices that were seized last week, have  
22 they been completely reviewed yet?

23 A No.

24 Q Okay. So more time is needed to do that.

25 A Yes.

1 Q Okay. Let's talk -- go back to Starkylol. During the  
2 investigation into Starkylol, did FBI utilize an undercover  
3 Telegram account to communicate with the Defendant?

4 A Yes.

5 MR. BATARSE: And I'm going to -- may I approach,  
6 Your Honor?

7 THE COURT: You may.

8 BY MR. BATARSE:

9 Q I'm going to show you what's been marked as Government  
10 Exhibit 1. Do you recognize what this is?

11 A Yes.

12 Q Okay. Tell the Court what this is.

13 A So this is a screenshot of the Starkylol Telegram page  
14 that belongs to Starkylol. It shows the subscribers and it  
15 also shows a link.

16 Q Okay. And then this page here, is this a post that's  
17 on there?

18 A Yes, that's correct.

19 MR. BATARSE: Okay. Your Honor, I tender  
20 Government's Exhibit 1 to opposing counsel for any  
21 objection.

22 (Pause)

23 MR. DOYLE: No objection.

24 THE COURT: All right. Exhibit 1 is admitted.

25 (Government's Exhibit Number 1 was received in

1 evidence.)

2 MR. BATARSE: Your Honor, United States intends to  
3 enter certain screenshots. Many of the screenshots have  
4 illicit and material that should not be published for  
5 purposes of the victims in the case and the ongoing  
6 investigation.

7 So with -- the United States respectfully requests  
8 that we will enter the exhibits into evidence for the  
9 purposes of this hearing, and then either request to seal it  
10 or remove the exhibits with us after the hearing's complete,  
11 whatever is more amenable to the Court.

12 THE COURT: I think that we should seal them so  
13 that if there's any review of my decision, the record will  
14 be there for --

15 MR. BATARSE: Yes, Your Honor.

16 THE COURT: -- the district judge.

17 MR. BATARSE: Okay. Yes, Your Honor.

18 I'm showing you what's marked --

19 THE COURT: So just so we're clear, --

20 MR. BATARSE: Yes.

21 THE COURT: -- the -- all of the exhibits to this  
22 detention hearing will be docketed as sealed exhibits.  
23 Okay. Thank you.

24 (All exhibits ordered sealed.)

25 MR. BATARSE: Yes, Your Honor. And move to admit

1 Government's Exhibit 1. I don't know if that was entered,  
2 Your Honor.

3 THE COURT: Yes. It's admitted.

4 (Government's Sealed Exhibit 1 received in evidence.)

5 MR. BATARSE: Okay. All right.

6 BY MR. BATARSE:

7 Q Looking at Government's Exhibit 1, that's the Starkylol  
8 screenshot from his account.

9 Yes.

10 Q How many subscribers does he have?

11 A Five thousand, nine hundred and thirty-one subscribers.

12 Q And approximately when was this screenshot taken?

13 A May of 2023.

14 Q So, what, two months ago.

15 A That's correct.

16 Q Okay. And how many photos have been posted?

17 A Two hundred and twenty-seven photos.

18 Q How many videos?

19 A A hundred and fifty-two videos.

20 Q Okay. And then over here, what is this post that he's  
21 got at the top of his channel?

22 A So the post by Starkylol says: Want to make a note  
23 that all of the content I post aren't from trades or  
24 anything found online. All of the content is originally  
25 mine and no one else's. That's what makes my collection so



1 great. And then there's a emoji with a smiley face.

2 Q And then what's this other pin message that he has  
3 here?

4 A So there's a pin message that says: Here is a backup  
5 for this channel, and then there is a link.

6 Q Okay. And underneath that.

7 A Disclaimer: None of the girls I post have an OF. I  
8 target the more innocent and amateur girls.

9 Q And what does O-F stand for?

10 A For my eyes only.

11 Q No, is that Only Fans?

12 A Oh, Only Fans, yes.

13 Q Is that a pornographic -- is that a website where  
14 people can voluntarily post content?

15 A That's correct.

16 Q So he's saying that his content does not contain Only  
17 Fans content, correct?

18 A Right.

19 Q Okay. We mentioned during the investigation that FBI  
20 communicated with him with an undercover account, correct?

21 A Correct.

22 Q And so if the Telegram channel is public, so let's say  
23 you as a person observing the Telegram channel and you see  
24 something publicly, are you able to directly message or  
25 personally message the author of the channel?

1 A You can, yes.

2 Q And are those direct messages public or private?

3 A Private.

4 Q So did FBI privately message the Defendant at  
5 Starkylol?

6 A Yes.

7 Q And did the Defendant offer to sell collections of  
8 photographs that he had obtained?

9 A Yes.

10 Q Okay. Can you read what the pricing is for the  
11 photographs obtained?

12 A So for the pricing, it says: All college girls, \$130.  
13 All college and blackmail \$155. All college, blackmail, and  
14 under 18 is \$215.

15 Q And what does it say under there?

16 A Crypto only, no exceptions. Previews are in my public  
17 Telegram channel. The channel link is in my profile bio.  
18 No trades. And then it gives photo sizes are 21 gigabytes,  
19 29 gigabytes, and 31 gigabytes.

20 Q Okay. So to be clear, what it -- what Starkylol is  
21 saying here appears to be that there is a public Telegram  
22 channel which is a preview; is that correct?

23 A That's correct.

24 Q And then a user can privately communicate with him on  
25 the Telegram channel, correct?

1 A Correct.

2 Q Which is encrypted, right?

3 A Yes.

4 Q And then transfer monies, specific amounts of monies,  
5 to the Defendant via cryptocurrency.

6 A That's correct.

7 Q Why might somebody like to use cryptocurrency instead  
8 of maybe Zelle or some other, you know, method of sharing  
9 funds?

10 A Cryptocurrency is a lot harder to track.

11 Q Okay. A lot -- is it a lot harder to trace where it  
12 comes from and goes to?

13 A Where it goes to, yes.

14 Q Okay. Have you had a chance to review the Telegram,  
15 the public Telegram channel in this case?

16 A Yes.

17 Q Okay. Based on what he's publishing on the public  
18 Telegram channel, what's -- what is it really that he's  
19 advertising?

20 A So from advertising you see adult women and minors  
21 aging from approximately 16 to 25 years of age. You have  
22 some that are completely nude. You have some that are  
23 engaged in oral penetration or just sexual acts in general.

24 Q Okay. Now, the way -- is this an extensive Telegram  
25 channel; are there a lot of posts?

1 A There's a lot of posts.

2 Q Okay. Is -- regarding the -- so it says in the excerpt  
3 you just read about blackmail, explain what he means when he  
4 says blackmail.

5 A So what he means by blackmail is that he'll take the  
6 pictures that he has and he'll show them to the girls and  
7 say that if you don't produce more of these pictures, then I  
8 will send it out to the girl's families or friends.

9 Q Okay. And you said pictures that he has. Is he able  
10 -- does he brag about being able to get -- to hack into  
11 girls' accounts?

12 A Yes.

13 Q Okay. And so when he's in these accounts, what kind of  
14 -- are you familiar with Snapchat?

15 A Yes.

16 Q What is Snapchat?

17 A So Snapchat is another application that can be used on  
18 a mobile device. It's free. You can upload videos and  
19 photographs to send to friends or whoever you make as your  
20 friends. You can also send messages on there also.

21 Q Okay. In order to get into a Snapchat account, do you  
22 have to have a user name and a password?

23 A Yes.

24 Q Okay. And are there certain areas in your Snapchat  
25 account that -- is there called a for my eyes only folder?

1 A Yes.

2 Q What is that?

3 A So for my eyes only is essentially what it says, is  
4 that when you're the user of that Snapchat account, you can  
5 take photographs, videos, and then you can put it only in  
6 that and you should only have access to be able to see those  
7 images or videos.

8 Q Okay. And throughout his posts on his public Telegram  
9 channel, does he brag about being able to obtain files from  
10 the for my eyes only file?

11 A Yes.

12 Q So that is not only past the user and password but it's  
13 a separate folder within the user's account, correct?

14 A That's correct.

15 Q Okay. So then the Defendant would obtain these  
16 sensitive photos or these private photos of these girls and  
17 then would communicate with them. How would he communicate  
18 with them the photos, how would he reach out to them?

19 A He would reach out to them from various different phone  
20 numbers. But he would reach out to them. And once he  
21 reached out to them, he would show them their photographs,  
22 and he would basically tell them that, you know, I would  
23 like more of these particular photographs, and if you can't  
24 provide those, then I'll send this photograph that he took  
25 for the for my eyes only, I will take this particular

1 photograph and then I'll send it to friends and family.

2 Q Okay. So it initially involves the unauthorized access  
3 to their account, correct?

4 A Correct.

5 Q And then it involves extorting them for original  
6 content, correct?

7 A Correct.

8 Q Now, when the -- is he communicating with them like on  
9 the phone talking to them or is this all through messaging?

10 A All through messaging.

11 Q Does he in fact post the messages on his Telegram  
12 channel to see how the exploitation works?

13 A Yes.

14 Q And to verify that he in fact is obtaining these images  
15 and videos through coercion.

16 A Yes.

17 Q Okay. I want to show you what's been marked as  
18 Government's Exhibit Number 2.

19 MR. BATARSE: May I approach, Your Honor?

20 THE COURT: You may.

21 BY MR. BATARSE:

22 Q Is this another post on the Starkylol channel?

23 A Yes.

24 MR. BATARSE: Okay. Tender to opposing counsel  
25 for any objection.

1 (Pause)

2 MR. DOYLE: No objection.

3 MR. BATARSE: United States moves to enter  
4 Government's Exhibit Number 2.

5 THE COURT: Exhibit Number 2 is admitted.

6 (Government's Sealed Exhibit 2 received in evidence.)

7 MR. BATARSE: Okay.

8 BY MR. BATARSE:

9 Q Can you read one of the messages that was posted by  
10 Starkylol on his Telegram channel?

11 A It says, I want to make a note that all of the content  
12 I post aren't from trades or anything found online. All of  
13 the content is originally mine and no one else's. That's  
14 what makes my collection so great. There is emojis, smiley  
15 face emojis. If anyone wants to buy any of the girls I post  
16 on here, message at Starkylol for their complete sets.

17 Q Okay. So then this is just a big advertisement for the  
18 sets that he sells; is that right?

19 A Yes.

20 Q Okay. On some of these posts, I'm going to show you  
21 what's been marked as Government's Exhibit Number 3. Did  
22 the United States file a complaint in this case?

23 A Yes.

24 Q Okay. And was that for the sexual exploitation of a  
25 minor?

1 A Yes.

2 Q Okay. I'm showing you what's been marked as  
3 Government's Exhibit Number 3. It's one, two, three, four,  
4 five, six, seven, eight, nine, ten, it's ten pages; are you  
5 familiar with what these screenshots or images depict?

6 A Yes.

7 Q And what is it?

8 A So this is a screenshot of a minor victim that was  
9 identified. She's about approximately 16 years of age,  
10 engaging -- and she's nude, she has videos of her  
11 masturbating. And she's being instructed to do this.

12 Q Okay. Is this -- is Government's Exhibit Number 3 a  
13 combination of the Telegram posts and other content that was  
14 either provided by the victim or provided on these websites  
15 that were part of the investigation?

16 A That's correct.

17 Q I'm noticing on some of these images that there is a  
18 watermark on images that are found on these websites. What  
19 is this watermark?

20 A So the watermark, it says Telegram, and then it says at  
21 Starkylol.

22 Q What does this mean?

23 A So a watermark is basically meaning that that  
24 particular image is kind of from his page, so that watermark  
25 is pretty much a stamp, like a stamp saying, hey, this is my



1 content.

2 Q Well if someone's producing illegal content, why would  
3 they stamp it that way?

4 A Might want people to know that it's their content.

5 Q Is this also a type of advertisement?

6 A It is.

7 Q Okay. So these are screenshots of conversations  
8 between the complainant and -- the minor victim and the  
9 Defendant.

10 A Yes.

11 Q Okay. And then at the very end here, are these  
12 screenshots that were provided by the victim?

13 A Yes.

14 Q Was she in fact interviewed?

15 A She was interviewed.

16 Q And did she in fact confirm that she was 16 at the time  
17 that the photos and videos were created?

18 A She was.

19 Q Did she explain why she created photos and images for  
20 the Defendant?

21 A She did.

22 Q Why?

23 A She did that because, again, she was told that if she  
24 doesn't produce any of these videos or photographs, that the  
25 Starkylol would then send the pictures out to her family and

1 friends.

2 MR. BATARSE: The United States tenders  
3 Government's Exhibit 3 to opposing counsel for any  
4 objection.

5 (Pause from 10:27 a.m. to 10:28 a.m.)

6 MR. DOYLE: No objection.

7 THE COURT: Exhibit 3 is admitted.

8 (Government's Sealed Exhibit 3 received in evidence.)

9 MR. BATARSE: Okay. United States moves -- oh,  
10 thank -- Your Honor, may I have permission to publish to the  
11 Court for the Court's review?

12 THE COURT: Yes. You can hand it to Mr. Marchand.

13 MR. BATARSE: Yes, Your Honor.

14 THE COURT: Thank you. What is the page 17, all  
15 the phone numbers, what are those?

16 BY MR. BATARSE:

17 Q Agent Campbell, can you explain to the Court what all  
18 those different phone numbers are on that screenshot?

19 A Yes. So all those phone numbers are different phone  
20 numbers that he would utilize to -- Starky lol would utilize  
21 to contact the different women.

22 THE COURT: All right. Mr. Marchand.

23 BY MR. BATARSE:

24 Q Just for purposes of the record, in this exchange, did  
25 he actually send her photographs from her account without

1 her permission?

2 A Yes.

3 Q Okay. And then is he instructing her how to send the  
4 videos and the images?

5 A Yes.

6 MR. BATARSE: And we won't go into detail, the  
7 Court has already read it.

8 Q And then here does he tell her that if she doesn't send  
9 these, then he won't keep these pictures and videos secret?

10 A Yes.

11 Q Okay. I'm going to show you what's been marked as  
12 Government's Exhibit Number 4. Do you recognize these  
13 screenshots?

14 A Yes.

15 Q Okay. And are these screenshots of another  
16 conversation that the Defendant had with another victim?

17 A That's correct.

18 Q Is it clear whether or not this victim is over or under  
19 the age of 18?

20 A Not really.

21 Q Okay. Would you say it's a teenage girl?

22 A I would say it's a teenage girl.

23 Q Okay. But not sure if it's -- if this is an  
24 unidentified victim at this point, correct?

25 A That's correct.

1 Q Okay. And this conversation, the screenshots of this  
2 conversation, are these from another website that publishes  
3 this type of material?

4 A That's correct.

5 Q And are these watermarked images again showing that  
6 these came from Starkylol?

7 A Yes.

8 Q Okay. And what do these messages indicate between  
9 Starkylol and this particular user?

10 A So this message indicates that Starkylol was  
11 instructing this user to make videos. He was telling her  
12 how to do it. And the victim was doing exactly what was  
13 asked.

14 Q Was it obvious -- is it obvious from some of the images  
15 that the victim is doing this voluntarily or involuntarily?

16 A She's doing it involuntarily.

17 Q And what is that obvious?

18 A Because in the photographs you can see her crying.

19 Q Okay. And does he in fact reference the fact that  
20 she's crying in the messaging?

21 A Yes.

22 Q And does he continue to ask her to produce more  
23 content?

24 A Yes.

25 MR. BATARSE: Okay. At this time the United

1 States tenders Government's Exhibit Number 4 to opposing  
2 counsel for any objection.

3 (Pause from 10:33 a.m. to 10:34 a.m.)

4 MR. DOYLE: Judge, if I could just ask a couple  
5 questions before -- of the agent before I make an objection  
6 just to understand where -- I don't completely understand  
7 where this is coming from.

8 THE COURT: So you want to ask questions to  
9 authenticate the --

10 MR. DOYLE: To authenticate --

11 THE COURT: -- exhibit.

12 MR. DOYLE: -- the exhibit.

13 THE COURT: All right. I'll allow it.

14 MR. DOYLE: Thank you.

15 VOIR DIRE EXAMINATION

16 BY MR. DOYLE:

17 Q Special Agent, you said that you obtained these images  
18 from another website, correct?

19 A That's correct.

20 Q And which website is that?

21 A So right now it's still an ongoing investigation so I'm  
22 not --

23 Q Okay.

24 A -- able to disclose that.

25 Q And this website, what affiliation does Mr. Venegas

1 have with website? Do you have any evidence that he owns  
2 this website?

3 A At this time it's still an ongoing investigation.

4 Q Okay. And these watermarks, do you know who -- anybody  
5 could put any watermark on an image, correct?

6 A (No audible response.)

7 Q In other words, how do you know that -- how do you link  
8 these messages and this watermark? Just because it puts his  
9 Starkylol on it, how do you know he did it or had anything  
10 to do with these images, --

11 A Just --

12 Q -- other than the watermark?

13 A Yes, sir. Based off just law enforcement and us still  
14 doing our ongoing investigation, we're pretty much able to  
15 identify that it came from a Starkylol.

16 Q How are you identifying that?

17 A At this time I can't disclose that due to it being an  
18 ongoing investigation.

19 Q And --

20 MR. BATARSE: If I can clarify that question for  
21 you so that way -- for the Record?

22 BY MR. BATARSE:

23 Q On the publicly viewable Telegram account, the images  
24 that Starkylol is publishing on Telegram, are those images  
25 watermarked as well?

1 A Those are.

2 Q And is it the same watermark that appears on the images  
3 that's on -- in Government's Exhibit Number 4?

4 A Yes.

5 MR. BATARSE: Okay. Sorry.

6 BY MR. DOYLE:

7 Q Other than it being the same watermark, you know on the  
8 internet people copycat others, people say things that  
9 aren't true. Is there any way to know that somebody else  
10 didn't put the watermark, his watermark on these images? Do  
11 you have any way to prove that one way or the other?

12 A Not at this time, no.

13 MR. DOYLE: Okay. Judge, I'd object to the  
14 admissibility. Other -- I don't think that there's enough  
15 evidence that would link him to this other than a watermark  
16 from another website that we have no evidence he's  
17 necessarily affiliated with.

18 THE COURT: Response, Mr. Batarse.

19 MR. BATARSE: Your Honor, the -- so two things.  
20 Number one, the -- as she's testified on the record, that  
21 the watermark is a way that these users are identifying the  
22 content that they created, he's gone to great lengths on his  
23 public advertising channel for Telegram to describe that he  
24 has original content, that content is available not solely  
25 on Telegram.

1 But as we discussed at the beginning of the  
2 testimony, it's available in a variety of places online  
3 where people seek this particular type of blackmail and  
4 extortion material.

5 I mean, if the Court wishes, you know, we can set  
6 this particular image aside and we have plenty more. But it  
7 is the same watermark that appears on the publicly viewable  
8 sites. And I can elicit testimony from the agent that, you  
9 know, the images of the minor victim were obtained from the  
10 publicly viewable Telegram channel and from these other  
11 websites as well, and this minor -- in other words, this --

12 THE COURT: All right. The agent can testify  
13 because she has the information to which she can testify.  
14 There's an objection to the authenticity of the Exhibit 3 as  
15 to whether or not --

16 MR. BATARSE: Exhibit 4, Your Honor.

17 THE COURT: Exhibit 4.

18 MR. BATARSE: Yes, Your Honor.

19 THE COURT: As to whether or not it's actually  
20 from the Defendant's -- whether it's pictures that he  
21 watermarked or someone else watermarked with his -- with  
22 that same moniker. So I'm going to -- I'm not going to  
23 admit Exhibit Number 4 into evidence --

24 MR. BATARSE: Yes, Your Honor.

25 THE COURT: -- for today.



1 MR. BATARSE: Okay.

2 DIRECT EXAMINATION (RESUMED)

3 BY MR. BATARSE:

4 Q Special Agent Campbell, throughout your review of the  
5 publicly viewable Telegram channel, were you able to observe  
6 that there are numerous women that are depicted?

7 A Yes.

8 Q And is it obvious that there -- some of the women are  
9 the victims are either under the age of 18 and over the age  
10 of 18?

11 A Yes.

12 Q At this point in the investigation, how many minor  
13 victims have been identified by FBI?

14 A Two.

15 Q Okay. So the one that we just mentioned, which was the  
16 minor victim that's alleged in the complaint, and there's  
17 another minor victim as well.

18 Yes.

19 Q And she's been positively identified.

20 A Yes.

21 Q She residing in another jurisdiction?

22 A Yes.

23 Q Okay. Now, on the Telegram channel, so we already read  
24 an excerpt that he's advertising underage girls; is that  
25 correct?

1 A That's correct.

2 Q Okay. So I'm going to show you what's been marked as  
3 Government's Exhibit Number 7. Are these some screenshots  
4 of girls that are listed on this publicly viewable channel  
5 that appear to be under the age of 18?

6 A That's correct.

7 Q Does one of the girls literally say -- actually say  
8 literally 17 in one of the images?

9 A Yes.

10 Q What's marked as page 32 in here; --

11 THE DEFENDANT: She's not 17. She's --

12 Q -- is that correct?

13 A That's correct.

14 Q And are all of these taken from his publicly viewable  
15 account?

16 A Yes.

17 Q At this point has FBI been able to identify these  
18 girls?

19 A Not at this point.

20 Q Okay. And can you definitively testify that these  
21 girls are under the age of 18?

22 A No.

23 Q But do they appear to be under the age of 18?

24 A Yes.

25 Q And is this all publicly posted on his Telegram

1 channel?

2 A Yes.

3 MR. BATARSE: Tender Government's Exhibit Number 7  
4 for any objection.

5 (Pause)

6 MR. DOYLE: No objection.

7 MR. BATARSE: Your Honor, at this time United  
8 States moves to admit Government's Exhibit Number 7 and  
9 publish to the Court.

10 THE COURT: Exhibit Number 7 is admitted.

11 (Government's Sealed Exhibit 7 received in evidence.)

12 There you go, Mr. Marchand. Thank you.

13 BY MR. BATARSE:

14 Q And for purposes of the record, are some of these  
15 images in Government's Exhibit 7, are these girls in  
16 cheerleading uniforms?

17 A Yes.

18 Q Okay. And they appear to be clearly in high school.

19 A Yes.

20 Q And then we also have one where it depicts two girls  
21 who appear to be under the age of 18 and says, and they were  
22 sisters; is that correct?

23 A That's correct.

24 Q And is the next picture next to it, is that a girl  
25 performing fellatio on a hairbrush?

1 A Yes.

2 Q How many views is that?

3 A Four thousand and fifty-six.

4 Q Okay. And then are these all side-by-sides, there's  
5 like a public image of the girl next to a nude image of the  
6 girl; is that correct?

7 A That's correct.

8 Q Okay. Throughout the account -- and this actually  
9 appears to be maybe a homecoming picture.

10 A Yes.

11 Q Okay. Throughout the Telegram channel, is that largely  
12 the style of advertisement that he engages in, namely he  
13 posts a publicly posted image of a girl from either one of  
14 her social media accounts or maybe a professional profile  
15 like LinkedIn, and then next to that he posts the nude or  
16 explicit image?

17 A Yes.

18 Q And in fact in some of the posts on the publicly  
19 viewable channel that is his advertisement, does he in fact  
20 post the LinkedIn information of some of the girls that he  
21 posting explicit images of?

22 A That's correct.

23 Q Now, does he redact those for the Telegram channel?

24 A Yes.

25 Q But in his private content, is that the lure of the

1 payment of the content that you get, the unredacted  
2 information?

3 A That's correct.

4 Q So what could a user -- so let's say a purchaser of  
5 this content, it's 29 gigs or 31 gigs of content, what could  
6 a user do with the personal information of a young girl  
7 namely, you know, personal profile and name, face, date of  
8 birth, what could somebody do with that kind of information?

9 A They could figure out where they work at, where they  
10 live at, where they reside at, and they can try to confront  
11 them, see where they work at, talk to them or try to harm  
12 them if that's something that they wanted to do.

13 Q Were there reports of other people trying to exploit  
14 maybe the same individual?

15 A Yes.

16 Q Okay. Regarding the undercover conversation that we  
17 refer to at the beginning, did -- so law enforcement reached  
18 out to Starkylol and he provided the pricing structure; is  
19 that correct?

20 A That's correct.

21 Q Did undercover officers engage -- they transfer money  
22 to Starkylol?

23 A That's correct.

24 Q And did they receive a link to the content that was  
25 described?

1 A That's correct.

2 Q And did that content contain many of the -- much of the  
3 content that's being described here?

4 A Yes.

5 Q Now, was the FBI able to get a complete copy of that  
6 content?

7 A No.

8 Q Why not?

9 A Because at some point it just stopped downloading.

10 Q Okay. But that link that was sent to FBI for FBI to  
11 download, did FBI make a determination -- was that a remote  
12 third party storage website that was being used to host the  
13 information?

14 A Yes.

15 Q Did FBI make a request to that third party website to  
16 determine how many times this -- the Defendant, the person  
17 who had sent the link, had sent links to content?

18 A Yes.

19 Q Approximately how many times did that occur?

20 A So that occurred about 1,924 times.

21 Q Okay. And just to be clear, we talked about that the  
22 pricing is minimum 130 for college girls, then 155 for  
23 college and blackmail, then 215 for college, blackmail, and  
24 under 18; is that correct?

25 A That's correct.

1 MR. BATARSE: Okay. And we're almost done.

2 BY MR. BATARSE:

3 Q I'm going to show you in one fell swoop here

4 Government's Exhibits Number 8 through 13.

5 MR. BATARSE: May I approach, Your Honor?

6 THE COURT: You may.

7 BY MR. BATARSE:

8 Q Are these also publicly viewable posts made by the

9 Defendant on his account?

10 A Yes.

11 Q Okay. And do they appear to depict the same kind of

12 side-by-side images where, you know, one that was publicly

13 posted and then the private content?

14 A That's correct.

15 Q Okay. And do these all have comments on them as well?

16 A Yes.

17 MR. BATARSE: Okay. Tender Government's 8 through

18 13 to opposing counsel for any objection.

19 (Pause)

20 MR. DOYLE: No objection.

21 BY MR. BATARSE:

22 Q And for the record, on this post, can -- on

23 Government's Exhibit 8, what does he say at the bottom, what

24 does he post at the bottom?

25 A It says, don't they know already? Post a TikTok dance,

1 I see it, I go after you.

2 Q And then Government's Exhibit Number 9, what are we  
3 seeing here?

4 A It says, secret content like this is only a small  
5 percentage of what I have.

6 Q Government's Exhibit Number 10.

7 A They will do the most to not end up leaked.

8 Q Is that -- on the left, is that a TikTok video?

9 A That is.

10 Q And on the right, is that an extremely graphic video of  
11 the same individual?

12 A Yes.

13 Q What does that mean, they will do the most to not end  
14 up leaked?

15 A Basically meaning that that extortion mechanism that we  
16 talked about before is that whenever he sends a photograph  
17 of them and he asks for more photographs, if they do not do  
18 it, then he will then say that I'm going to send this to  
19 your family and friends, meaning that I'm going to leak  
20 those photos out to the public so other people can see it.

21 Q So he's saying that's just (indiscernible).

22 A Yes.

23 Q Okay. And it's 7,020 views on that one.

24 A That's correct.

25 Q At the bottom, it says here -- what does it say?



1 A If you can't tell, she had just been crying.

2 MR. BATARSE: Okay. At the -- that was  
3 Government's Exhibit Number 11.

4 Q Now Government's Exhibit Number 12, what does that say  
5 on the bottom?

6 A I bet you'll miss me making you send nudes and  
7 fingering videos from your dorm.

8 Q And Government's Number 13, what does that say?

9 A Prom fuck videos -- I'm sorry, prom fuck vids are  
10 always, and it has a fire emoji.

11 Q Okay. During the review of the Defendant's -- is one  
12 of the electronic devices that was seized during the search  
13 warrant, is that currently under review?

14 A Yes.

15 Q Were files located on that device that obviously  
16 confirmed that the user of that computer is in fact Andrew  
17 Venegas?

18 A Yes.

19 Q And at this point is FBI able to say that there are at  
20 least 200 victims where there's images or videos that are  
21 contained on that device?

22 A That's correct.

23 Q Is there likely more on there?

24 A Likely, yes.

25 Q But has FBI been able to complete their investigation?

1 A Not at this time.

2 Q Okay. Roughly how long -- to FBI's knowledge, how long  
3 has the Defendant been engaging in this -- on this online  
4 activity?

5 A About 2021.

6 Q Until when?

7 A Until July 11, 2023.

8 Q And was that the execution of the search warrant?

9 A Not the 11th. I believe it was July 12th --

10 Q Okay.

11 A -- of 2023.

12 Q So is that approximately two years?

13 A Yes.

14 Q Okay. Regarding the Defendant under the moniker of  
15 Starkylol, would -- compared to other producers of content,  
16 is this Defendant considered a prolific producer or a  
17 regular producer?

18 A A prolific.

19 MR. BATARSE: Okay. Pass the witness, Your Honor.

20 THE COURT: Thank you, Mr. Batarse.

21 Mr. Doyle.

22 MR. DOYLE: Thank you, Your Honor.

23 CROSS-EXAMINATION

24 BY MR. DOYLE:

25 Q Special Agent Campbell, correct me if I'm wrong, if I'm

1 hearing this right. There are two known victims right now.

2 A Yes.

3 Q And based on your information with these two known  
4 victims, you know how these photos were originated and came  
5 into possession of Starkylol, right?

6 A Say it one more time.

7 Q Based on your investigation and conversations with the  
8 two known victims, those photos, you know how they ended up  
9 with Starkylol's account, correct?

10 A Which photos are you referring to?

11 Q The photos that were just published. One of them --  
12 there's one known victim, right, who resides here.

13 A Yes.

14 Q Correct?

15 A Yes.

16 Q But -- and I guess my point is, all of these other  
17 images, you don't know how they were -- they ended up on  
18 that Telegram account, correct?

19 A Do I not know how they ended up?

20 Q Well you don't know if they were consensually sent, you  
21 don't know if they were taken from someone else's Telegram  
22 account. You don't have the background on any of these  
23 other images right now.

24 A So based off of our investigation and interviews, there  
25 was interviews saying that. And if you look at the

1 screenshots, those videos that we're seeing, there's  
2 instruction on what needs to be done. And the girls are  
3 doing those instructions in the videos or images.

4 Q But you don't know what the relationship is with the  
5 girl. You don't know who gave the instructions. You just  
6 know there's an image on his Telegram account, correct?

7 A The instructions came from like I said different phone  
8 numbers believed to be Starkylol. And a lot of those  
9 females, that's what they talked about.

10 Q Okay. Well, let me -- when you executed the search  
11 warrant, you went to the residence of Mr. Venegas, correct?

12 A Yes.

13 Q And in that residence his parents also live there,  
14 correct?

15 A Yes.

16 Q If you could tell the Court whether or not the parents  
17 were cooperative with you.

18 A Absolutely they were.

19 Q Did they provide you their cellphones and let you look  
20 into on their devices?

21 A Yes.

22 Q Did you find anything inappropriate on their devices?

23 A Not for dad. So I only saw dad's. I didn't see mom's.  
24 But for dad I did not.

25 Q Did you ask the mom for her phone?

1 A Another agent did.

2 Q Did she provide it?

3 A I believe so, yes.

4 Q Did everything that was asked --

5 A Yes.

6 Q -- from the Government --

7 A Yes.

8 Q -- to them. And before you executed the search  
9 warrant, I assume you did a background check on Mr. Venegas.

10 A Yes.

11 Q Does he have any criminal history?

12 A No.

13 Q Throughout this extensive investigation, do you have  
14 any evidence that Mr. Venegas ever touched a child,  
15 solicited a child to his house to make physical contact?

16 A Not to my knowledge.

17 Q And if the Court were to remove internet privileges to  
18 Mr. Venegas, he would not be a threat; would you agree with  
19 me?

20 A I do not agree with that.

21 Q All of his -- all the activities you're describing to  
22 the Court came from behind a keyboard or a mobile device,  
23 correct?

24 A That's correct, to our knowledge.

25 Q So if internet was -- if he did not have access to

1 internet, okay, he could not be a threat, correct?

2 A That's not true.

3 Q Don't you have to have internet to engage in this kind  
4 of conduct?

5 A So the issue right now is that the images are already  
6 out there. So with these images or videos being out there,  
7 that doesn't stop a child from maybe wanting to commit  
8 suicide because they're ashamed of things that have been put  
9 on there, and they might go through other psychological  
10 issues that they might have.

11 MR. DOYLE: I'm going to object to nonresponsive.  
12 The --

13 THE COURT: She answered the question. But let's  
14 move on. I mean, --

15 MR. DOYLE: Okay.

16 THE COURT: -- I understand what your --

17 MR. DOYLE: Okay.

18 THE COURT: -- questioning is getting at. And --

19 MR. DOYLE: Okay.

20 THE COURT: -- I understand her answer. If you  
21 want to ask her -- I think the question is direct in terms  
22 of what's relevant to this detention hearing.

23 If the Defendant has no access to internet, do you  
24 have any evidence to show that he poses a danger to the  
25 community or specific individuals without being able to use

1 the internet?

2 THE WITNESS: No.

3 THE COURT: All right.

4 MR. DOYLE: No further questions, Your Honor.

5 THE COURT: All right. Any Redirect?

6 MR. BATARSE: Yes, Your Honor.

7 THE COURT: Okay.

8 MR. BATARSE: On those issues.

9 REDIRECT EXAMINATION

10 BY MR. BATARSE:

11 Q Let's talk about the internet privileges. Is it really  
12 possible to prevent someone from having access to the  
13 internet?

14 A No.

15 Q And was the Defendant utilizing a mobile device?

16 A Yes.

17 Q In addition to his desktop computer.

18 A That's correct.

19 Q Okay. And regarding the cooperation, absolutely the  
20 parents were cooperative. Was the Defendant informed that  
21 the warrant for his residence also included a warrant to  
22 search his person?

23 A It was.

24 Q And was he also informed that the warrant authorized  
25 obtaining biometric data in order to unlock his phone?

1 A That's correct.

2 Q And did he intentionally not cooperate and allow the  
3 Government to execute that search warrant?

4 A That's correct.

5 Q After multiple times of requests.

6 A That's correct.

7 Q And he was uncooperative with that mandated request --  
8 authorization from the warrant; is that correct?

9 A That's correct.

10 Q Which was specifically articulated to him multiple  
11 times.

12 A That's correct.

13 Q Okay. And regarding the mobile device, his parents  
14 obviously are cooperative. The Defendant lives in his  
15 parents' house, correct?

16 A That's correct.

17 Q He has been doing this for two years at least that  
18 we're aware of, correct?

19 A That's correct.

20 Q In their home; is that correct?

21 A Yes.

22 Q Is it a mobile device, a phone, how big is a phone?

23 A It's not that big. It's pretty small.

24 Q Can you purchase a phone at a Walmart?

25 A You can.



1 Q Can you purchase a phone pretty much anywhere that  
2 people sell things?

3 A Yes.

4 Q Is it reasonable or conceivable that you can limit  
5 internet to a particular person if they have access to a  
6 device?

7 A Yes.

8 Q Yes or no, can you limit the internet access that  
9 someone can have?

10 A No.

11 Q Okay.

12 THE COURT: Wait.

13 Q I also want to --

14 THE COURT: Hold on.

15 MR. BATARSE: Yes, Your Honor.

16 THE COURT: I understand you can purchase a phone.  
17 But if you want to have a phone that accesses the internet,  
18 you've got to have an account, you've got to have some  
19 internet access. I mean, you have to have -- just  
20 purchasing a phone that can be used as a telephone doesn't  
21 mean it's a smartphone that can access the internet,  
22 correct?

23 MR. BATARSE: There's a difference between a data  
24 plan and being able to access Wi-Fi. I mean, so what we're  
25 dealing with is if you have a mobile device, yes, you need

1 the -- an internet plan if you want mobile access to -- and  
2 I can ask questions regarding this.

3 But with regard to accessing Wi-Fi, for instances,  
4 that's readily available. I mean, you know, you can't -- we  
5 can have that discussion during argument, but I can clarify  
6 this through the witness testimony.

7 BY MR. BATARSE:

8 Q The Honorable Court can't restrict other people from  
9 having access to Wi-Fi, and the nature of Wi-Fi is --

10 THE COURT: Are you talking about in their home?  
11 I can restrict people's access to the internet in their  
12 home.

13 MR. BATARSE: Sure. But there's neighboring  
14 homes, you know, and then, you know, phone devices. There's  
15 ways that a person can obtain access to Wi-Fi that doesn't  
16 merely require mobile access.

17 And I would venture to guess that the access that  
18 was being used on the mobile device was probably Wi-Fi  
19 access.

20 And so the answer is it's both yes and no. I  
21 mean, you can also get, you know, prepaid plans which have  
22 mobile access so that you would have mobile internet without  
23 the consent or knowledge.

24 So, you know, it's -- the United States doesn't  
25 believe -- and if the Court wishes, I can obtain testimony

1 regarding this. But the issue here is that the Court is  
2 correct to say that a large portion of the threat that the  
3 Defendant has presented and continues to present is his  
4 ability to access the internet.

5 But in this instance, a person who's capable of  
6 hacking into girls' accounts over and over and over again, a  
7 person who's been able to -- you know, the sophistication of  
8 hiding behind all these different manners and doing it all  
9 under the nose of his family who -- with whom he would, you  
10 know, if he were released would still be living with, it  
11 just seems under these particular circumstances you have a  
12 -- you've got a lopsided level of skill and a desire to  
13 engage in such activity.

14 THE COURT: All right. Any other questions for  
15 this witness?

16 MR. BATARSE: Yes, Your Honor.

17 BY MR. BATARSE:

18 Q Regarding some of the questions about how do you know,  
19 was it communicated to you by the office that the agents who  
20 are reviewing the device, were there screen recordings on  
21 the -- one of the electronic devices that was obtained at  
22 his home?

23 A Yes.

24 Q And do those screen recordings show him entering  
25 without access to girls' accounts?

1 A They do.

2 Q So it actually records his screen doing that.

3 A Yes.

4 Q And at various times are there actual images of this  
5 Defendant, this person sitting here actually being the  
6 person behind the screen?

7 A Yes.

8 Q And did law enforcement find a list of Snapchat  
9 usernames and passwords on his device?

10 A Yes.

11 Q Was that a long list?

12 A It was a long list.

13 Q Okay. Was that in the hundreds?

14 A Yes.

15 MR. BATARSE: I think that's all the questions in  
16 response.

17 THE COURT: All right. Thank you, Mr. Batarse.

18 MR. BATARSE: Yes, Your Honor.

19 THE COURT: Any other cross-examination?

20 MR. DOYLE: No, Your Honor.

21 THE COURT: All right. You may step down, Agent  
22 Campbell.

23 (Witness steps down.)

24 Any other witnesses for the Government?

25 MR. BATARSE: No, Your Honor.

1 THE COURT: Do you have any witnesses to call?

2 MR. DOYLE: I just would like to proffer for Maria  
3 Venegas, Mr. Venegas's mother, who he would live with if he  
4 were out on bond. She would testify that she would follow  
5 any instructions that the Court sets, any restrictions that  
6 the Court sets, they -- that she would be there to supervise  
7 them. Now that they're aware of these allegations, they  
8 will make sure and follow any -- that he follows it, they  
9 will maintain custody of him and do whatever the Court  
10 instructs.

11 And then on behalf of Armando Venegas, his father,  
12 who is currently not employed now, who can supervise him  
13 around the clock and make sure to do whatever the Court  
14 requests of him if the Court releases him on bond, they will  
15 comply with everything that the Court asks of them.

16 And, Judge, we'd also just like to -- I think you  
17 have it but just offer the pretrial report.

18 THE COURT: I've read it.

19 MR. DOYLE: Okay. That's all from the defense,  
20 Your Honor.

21 THE COURT: All right. I don't really need a  
22 whole lot in terms of argument.

23 Well, first of all, let me get on the record that  
24 we were scheduled for a preliminary and detention hearing.  
25 At the start of this hearing, the Defendant waived or passed

1 the preliminary portion of the hearing; is that correct?

2 MR. DOYLE: That's correct, Your Honor.

3 THE COURT: So there's no contest to probable  
4 cause at this point.

5 MR. DOYLE: That's correct, Your Honor.

6 THE COURT: All right. So probable cause finding  
7 has been made.

8 All right. I don't need a lot of argument but I  
9 would like to focus on the -- I would like more information  
10 on a few issues. First of all, what is this Defendant's  
11 job? What is a commission specialist? I know where he  
12 works but what does he do? Does he have to have a computer  
13 to do it, etcetera?

14 MR. DOYLE: He's a data analyst and he has a work  
15 computer that he would need access to to input the data.  
16 But he could get another job, Your Honor. If a computer's  
17 required, he can go find another job that does not require a  
18 computer.

19 THE COURT: And where does his mother work?

20 Ma'am, can you stand up, please? Where do you  
21 work?

22 MS. VENEGAS: I work at (indiscernible).

23 THE COURT: And what are your hours?

24 MS. VENEGAS: My hours vary because I'm in sales.

25 THE COURT: Well get -- can you give me general

1 hours? Do you work from home or do you work --

2 MS. VENEGAS: Eight to 5:00.

3 THE COURT: Do you work in an office?

4 MS. VENEGAS: Yes.

5 THE COURT: Generally 9:00 to 5:00.

6 MS. VENEGAS: Yes.

7 THE COURT: Do you need to have internet at home  
8 for your work?

9 MS. VENEGAS: Not necessarily because I have my  
10 office and I have -- my office where I have internet.

11 THE COURT: And does your husband need to have  
12 internet at home?

13 MS. VENEGAS: No.

14 THE COURT: What about your other child who lives  
15 at home?

16 MS. VENEGAS: No. My other son is in college, not  
17 home yet.

18 THE COURT: Not home yet. Is he coming home for  
19 the summer?

20 MS. VENEGAS: More than likely.

21 THE COURT: Okay. But he does not have to have  
22 internet at the house.

23 MS. VENEGAS: No, ma'am.

24 THE COURT: All right. Anything else from the  
25 Defendant to proffer?

1 MR. DOYLE: No, Your Honor.

2 THE COURT: All right. I'm ready for argument.

3 MR. BATARSE: Your Honor, under 3142(g), the  
4 factors that are required for the Court to consider, as the  
5 Court is aware, the nature and the circumstances of the  
6 offense charged, including whether the offense is --  
7 involves a minor victim.

8 There's been lots of evidence before the Court  
9 obviously of at least two minor victims and potentially more  
10 victims who have yet to be unidentified.

11 This is a presumption case for a reason. The  
12 Defendant is not only a danger to adult young females but  
13 also to minor victims as well. So 3142(g)(1) weighs heavily  
14 against the Defendant; (g)(2), the weight of the evidence  
15 against a person is extremely extensive. I won't go into  
16 detail. The Court has heard all of the evidence.

17 The nature and seriousness of the danger, which is  
18 section four, to any person or the community that would be  
19 posed by the person's release.

20 Your Honor, as the Court has accurately  
21 identified, in practice trying to limit a person's access to  
22 the internet is in practice impossible, particularly if  
23 someone is going to be living in a residential neighborhood  
24 or possibly working.

25 I'm -- I -- the Defendant's current job, which is



1 the evidence that's before the Court, involves data  
2 analysis, and that's going to involve computers. Most any  
3 job that somebody would work in if they were released would  
4 involve computers.

5 Any phone can also be utilized as a hot spot so it  
6 doesn't necessarily just have to be a fixed modem or a fixed  
7 router.

8 The idea that, you know, that United States or  
9 this Court would be able to set conditions that would  
10 totally prohibit this person from accessing the internet is  
11 not reasonable under the circumstances, particularly given  
12 the type of offense that we're dealing with where the  
13 Defendant has been able to conceal his identity.

14 None of these victims -- there's testimony before  
15 this Court is that the Defendant has been utilizing an alias  
16 this entire time in order to effectuate the crimes that he's  
17 been doing against all of these victims. And to be clear,  
18 we're talking about hundreds of people.

19 And whether or not they're minors, this is all  
20 extortion, this is blackmail, this is, you know, these are  
21 -- whether or not they're under the age of 18, these are  
22 still people that he is taking advantage of.

23 And the reach that he has had has been extremely  
24 extensive. I mean, this -- there is no limitation.

25 So the question before the Court is, it's not, you

1 know, is there -- is it hypothetically possible. But given  
2 the circumstances as it presents itself, mainly that he's  
3 been living in this same place for this amount of time,  
4 committing these crimes here and, you know, the Defendant  
5 does have other siblings, neighbors, you know, presumably  
6 would have access to the world, it just seems that there  
7 isn't a reasonable way to ensure the safety of the community  
8 by merely restricting his internet access in one way or the  
9 other.

10 And so for these reasons the United States  
11 believes that the presumption still applies to this  
12 Defendant and that there is not a set of conditions or --  
13 that this Court can impose that can reasonably assure the  
14 community that further victims will not be victimized.

15 THE COURT: Thank you, Mr. Batarse.

16 Mr. Doyle.

17 MR. DOYLE: Thank you, Your Honor. I believe the  
18 presumption's been rebutted. It's -- the Government's  
19 argument is more towards the weight and not towards  
20 conditions that would assure his appearance and not to be a  
21 danger.

22 He has strong family ties. His parents are  
23 obviously aware of these allegations and are prepared to  
24 follow whatever conditions the Court sets.

25 He doesn't have criminal history. He's low risk.

1           You can put a GPS ankle monitor on him so you know  
2 everywhere he goes. You put him on house arrest where he --  
3 if he's going to go somewhere, he has to get permission to  
4 do it.

5           It also would allow for if the Court thinks it's  
6 necessary for us to get therapy and some treatment which he  
7 wouldn't able -- be able to do if he's in custody.

8           There are conditions that the Court could set.  
9 And if he violations those conditions, then the Court can  
10 revoke the bond.

11           Pretrial is good at their job, and they're  
12 vigorous when it comes to these cases. And they can make  
13 sure that there -- that he is complying. And he will  
14 comply. So there are conditions the Court can set.

15           THE COURT: How do we address the internet signals  
16 that come from neighbors?

17           MR. DOYLE: How do we -- well, --

18           THE COURT: Like how do we --

19           MR. DOYLE: -- we can --

20           THE COURT: -- prevent someone from getting on a  
21 neighbor's internet?

22           MR. DOYLE: Pretrial can make sure that he doesn't  
23 have access, number one.

24           THE COURT: How? I mean, if I'm in my house, I  
25 can see the internet signals --

1 MR. DOYLE: Well, you can --

2 THE COURT: -- from the people around me.

3 MR. DOYLE: You can get --

4 THE COURT: Other than making sure there are zero  
5 devices in the house --

6 MR. DOYLE: Right.

7 THE COURT: -- belonging to anybody.

8 MR. DOYLE: They can -- that's one way to do it.

9 Another way to do it is you can get your device and have a  
10 device and see if you can pick up a neighbor's one. It's  
11 going to be secured. If it's not secured, --

12 THE COURT: Maybe it is, maybe it isn't.

13 MR. DOYLE: -- they can determine that. Or just  
14 say no devices.

15 THE COURT: All right.

16 MR. DOYLE: Whatever --

17 MR. BATARSE: Your Honor, --

18 MR. DOYLE: -- conditions makes the Court feel  
19 comfortable we're willing to abide by.

20 THE COURT: All right. Thank you, Mr. Doyle.

21 Yes, Mr. Batarse.

22 MR. BATARSE: And just -- I apologize, Your Honor,  
23 just briefly respond. I think it is also important for the  
24 Court to consider the obstruction that the Defendant engaged  
25 in when the warrant was executed. He was uncooperative.

1 Yes, his family is cooperative but he is not.

2 And then in addition, the questions that you're  
3 asking defense counsel, it doesn't prevent somebody known to  
4 the Defendant bringing him a device to his home. There's  
5 really no reasonable way of preventing him if he wants  
6 access, which he does, to the internet from getting it.

7 MR. DOYLE: Judge, for what it's worth, --

8 THE COURT: I've heard enough.

9 MR. DOYLE: Okay.

10 THE COURT: All right. I would like the parents  
11 to come forward, Mr. Venegas to come forward because I'm  
12 going to be giving you some really important information  
13 that you have got to understand.

14 All right, first my findings. I do find that the  
15 presumption has been rebutted.

16 At this time I believe there are conditions of  
17 release that I can impose. They're going to be draconian in  
18 this -- for this day and age. You're not going to have  
19 internet. You're not going to have access to the internet.  
20 We have to eliminate his internet access in your home.

21 But I do think that I can impose conditions that  
22 reasonably assure the safety of the community and the type  
23 of people who have been victimized by the conduct.

24 And let me just say, the conduct that is alleged  
25 against you is reprehensible. And letting you out on

1 conditions of release requires me to believe that you are  
2 going to follow them. Because if you don't follow them,  
3 there are no conditions that I can set that can reasonably  
4 protect people from your conduct.

5           You are innocent until proven guilty. But I've  
6 heard a lot of evidence. There's a lot of electronic  
7 evidence. And it is very disturbing.

8           If at any time your supervising officer learns  
9 that you are not complying with every single condition, if  
10 you access the internet, if you get access to a telephone,  
11 if you access a computer, I'm going to get a report, you're  
12 going to be standing in front of me, and I can promise you  
13 there will not be a second opportunity to make me believe  
14 that you're going to comply with the conditions of release.  
15 Do you understand that?

16           THE DEFENDANT: Yes, Your Honor.

17           THE COURT: All right. These are the conditions  
18 I'm going to require for your release.

19           First of all, there's going to be a \$100,000  
20 unsecured bond that your parents are going to have to sign  
21 on as sureties, which means if you violate the conditions,  
22 the bond can be revoked, the United States can seek a money  
23 judgment against you and your parents for a hundred thousand  
24 dollars. Do you understand that?

25           THE DEFENDANT: Yes, Your Honor.

1 THE COURT: Do you understand that if you sign on  
2 as co-sureties, you are responsible for the \$100,000 in the  
3 event that the bond is forfeited?

4 MS. VENEGAS: Yes, ma'am.

5 MR. ARMANDO VENEGAS: Yes, Your Honor.

6 THE COURT: You're going to be supervised by  
7 Pretrial Services. You will have to seek fulltime  
8 verifiable employment that -- I mean, do you have to have  
9 the internet -- do you physically work in an office?

10 THE DEFENDANT: Yes, ma'am, yes, Your Honor.

11 THE COURT: Do you have to have internet access to  
12 do your job?

13 THE DEFENDANT: For certain parts of the job, no,  
14 Your Honor.

15 THE COURT: Well, when you go to your office and  
16 you're working in your office, I assume you're on some sort  
17 of network that belongs to the company.

18 THE DEFENDANT: Yes, just to save Excel files and  
19 -- mainly just to save Excel files. Entering data does not  
20 require an internet connection. It can always be saved  
21 offline.

22 THE COURT: All right. We're going to come back  
23 to the work issue because I don't know that we can install  
24 the kind of software monitoring programs that we install on  
25 someone -- I don't think we can.

1 U.S. PRETRIAL OFFICER: I don't know --

2 THE COURT: Yeah, all right, so I think he's going  
3 to have to get another job.

4 MR. DOYLE: This has been made public so we  
5 anticipate they may terminate him.

6 THE COURT: Okay. All right. So you'll have to  
7 get fulltime verifiable employment. You may not have  
8 employment that requires you to use a computer or access the  
9 internet, all right?

10 THE DEFENDANT: Yes, Your Honor.

11 THE COURT: You cannot obtain any passport. This  
12 report says you don't have one. If you do have a passport,  
13 you need to turn it in.

14 You -- I'm going to have you on home detention,  
15 which means you are inside your house unless you're meeting  
16 with your lawyer, going to the doctor, going to work, going  
17 to church, or for some sort of mental health counseling or  
18 treatment. Do you understand that?

19 THE DEFENDANT: I have a question. Does the  
20 backyard count as --

21 THE COURT: That's your home.

22 THE DEFENDANT: -- in the house?

23 THE COURT: That's still your home, yes. You're  
24 going to be on an active GPS monitoring, meaning your  
25 supervising officer will know where you are at all times.



1 I'm going to require you to undergo an evaluation  
2 to determine whether or not you would benefit from  
3 treatment, specifically sex offender treatment. If they  
4 decide that you would benefit from that, you must comply and  
5 undergo that evaluation and treatment.

6 To the extent you receive those services, you may  
7 be required to pay for them, depending on your ability to  
8 pay.

9 You have to avoid all contact with any  
10 codefendant, victim, or potential victim or witness.

11 You may not have or be in the vicinity of a  
12 firearm, destructive device, or other dangerous weapon. So  
13 the weapon that belongs to your other son has to be removed  
14 from the home before Mr. Venegas returns.

15 MS. VENEGAS: Yes, ma'am.

16 THE COURT: You shouldn't have any contact with  
17 law enforcement because you should only be in your home.  
18 But to the extent you have any contact with law enforcement,  
19 it has to be reported within 72 hours.

20 Trust me, if you don't report it, your supervising  
21 officer's still going to find out about it and then you're  
22 going to be here in front of me on a bond violation.

23 THE DEFENDANT: Is that reported through my  
24 attorney or through myself?

25 THE COURT: Sorry?

1 THE DEFENDANT: Whenever if I come into contact  
2 with any law enforcement, is that reported by myself or my  
3 attorney?

4 THE COURT: By you. These -- this is your  
5 responsibility. You report it to your supervising officer.

6 I've told you that you will incur the cost  
7 associated with any treatment based on your ability to pay.

8 You cannot have any contact with minors. Don't  
9 volunteer or -- this isn't even necessary because you are  
10 going to be at home. But no volunteering in organizations  
11 or activities involving minors.

12 Don't frequent or loiter places within a hundred  
13 feet of minors, which again is not going to be possible  
14 because you are going to be in your home.

15 Let's talk about the computers. All right. You  
16 may not have a computer, a cellphone that can access the  
17 internet, an iPad. Any type of electronic device that could  
18 access the internet, you may not have at all. Understood?

19 THE DEFENDANT: Yes, Your Honor.

20 THE COURT: Within the house, I read about a lot  
21 of different electronic devices. Can you all get rid of the  
22 electronic devices that are in your home?

23 MR. ARMANDO VENEGAS: Yes, ma'am.

24 MS. VENEGAS: Yes, ma'am.

25 THE COURT: All right. Let's do that. I think

1 that's the most -- that's the best option for making sure  
2 that there's no ability to access the internet.

3 So if someone gives you a cellphone, you cannot  
4 take it. Someone -- your brother lets you use a cellphone  
5 because he comes home for a visit, you may not touch it. No  
6 electronic devices whatsoever. Understood?

7 THE DEFENDANT: Yes, Your Honor.

8 THE COURT: And all the gaming consoles have been  
9 seized already.

10 MS. VENEGAS: Yes, ma'am.

11 MR. ARMANDO VENEGAS: Yes, ma'am.

12 THE COURT: Goes without saying, no social media  
13 because you have no access to the internet, no access to any  
14 electronic device, understood?

15 THE DEFENDANT: Yes, Your Honor.

16 THE COURT: Do not possess or peruse any type of  
17 sexually explicit material or any material that could be  
18 called child pornography.

19 If you are convicted of a sex-related offense, you  
20 will have to comply with all State laws regarding sex  
21 offender registration.

22 You may not violate any Federal, State, or local  
23 law while on conditions of release.

24 You must report any change -- well, you're not  
25 going to have a phone number so that's not necessary.

1           If for some reason there's a change in your  
2 address, it has to be reported in writing in advance to his  
3 supervising officer.

4           MS. VENEGAS: Yes, ma'am.

5           THE COURT: He's on home detention. He's only  
6 allowed to be in your home, to visit with his lawyer, to  
7 come to court, to go to church. And if he gets a job where  
8 he doesn't use a computer he can go to work. That's it.

9           MS. VENEGAS: Yes, ma'am.

10          MR. ARMANDO VENEGAS: Yes, ma'am.

11          THE COURT: All right. They're really serious --  
12 do you understand all the conditions I've given you?

13          THE DEFENDANT: Yes, Your Honor.

14          THE COURT: Oh, also you have -- part of your  
15 conditions are that you must appear for all of your court  
16 appearances. If you are convicted, you must surrender to  
17 serve your sentence.

18                If you fail to do that, if you are convicted, if  
19 you fail to surrender to serve or if you fail to appear for  
20 your court appearances, the bond could be revoked.

21                And I'm about to explain to you all the other  
22 consequences that are available if you fail to comply with  
23 these conditions.

24                And if you are found not guilty, the bond will be  
25 released. If you are convicted and you surrender to serve a

1 sentence, the bond will be released, and then your parents  
2 will no longer be liable for the hundred thousand dollar  
3 bond.

4 Does this offense qualify for DNA collection?

5 MR. BATARSE: Yes, Your Honor.

6 THE COURT: All right. You're also -- as part of  
7 your conditions of release is you must cooperate with the  
8 collection of a DNA sample. That will be maintained by law  
9 enforcement. Do you understand that?

10 THE DEFENDANT: Yes, Your Honor.

11 THE COURT: All right. There are very serious  
12 consequences for failing to comply with all of the  
13 conditions of release. I want to make sure you understand  
14 all the consequences.

15 If you violate any of the conditions, I can issue  
16 a warrant for your arrest. Your pretrial release can be  
17 revoked and you can be held in custody until the time of  
18 your trial. You could be prosecuted for contempt of court,  
19 imprisoned, fined, or both.

20 And I'm going to explain more to you the type of  
21 prison sentences you can get just for doing things you're  
22 not supposed to do on release.

23 As I mentioned, the bond will be forfeited, the  
24 total amount of the bond is due and owing, and the United  
25 States can obtain a judgment against you and your family or

1 seize property or security belonging to you or your family  
2 to satisfy the judgment.

3 It is a crime punishable by an additional ten  
4 years in prison and a fine of up to \$250,000, or both, to  
5 obstruct a criminal investigation, to attempt to influence  
6 or tamper with a witness, informant, or victim. That's why  
7 you may not have any contact with anyone that could be  
8 associated with this case. Do you understand that?

9 THE DEFENDANT: Yes, Your Honor.

10 THE COURT: If you commit a crime while on  
11 release, the punishment can be more severe than it would be  
12 if you committed the same crime while not on release.

13 If you commit a felony offense while on conditions  
14 of release, you can receive an additional term of  
15 imprisonment for up to ten years, an additional fine of up  
16 to \$250,000. And that additional prison time does not begin  
17 to run until after your underlying sentence is complete. Do  
18 you understand that?

19 THE DEFENDANT: Yes, Your Honor.

20 THE COURT: If you fail to appear in court when  
21 required, or if you are convicted and you fail to surrender  
22 to serve a sentence, you can be assessed additional term of  
23 imprisonment of up to ten years which, again, does not begin  
24 to run until the underlying sentence is complete, an  
25 additional fine of up to \$250,000.

1 I've talked to you about the forfeiture of the  
2 bond. I've talked to you about the release of the bond. If  
3 you are found not guilty or if you are convicted and you  
4 surrender to serve your sentence, the bond will be released  
5 as against you and your parents.

6 Do you fully understand all of the consequences  
7 for failing to comply?

8 THE DEFENDANT: Yes, Your Honor.

9 THE COURT: And, most importantly, what will  
10 happen if you fail to comply with any of these conditions is  
11 that your pretrial officer will submit a report to take  
12 action on your conditions of pretrial release. You're going  
13 to have to appear in front of me. And that's not going to  
14 be a good situation.

15 THE DEFENDANT: Yes, Your Honor.

16 THE COURT: All right. Is there anything from  
17 Pretrial that I need to cover?

18 U.S. PRETRIAL OFFICER: The only thing I know you  
19 wanted home detention and complying with home, but any  
20 travel like to Harris County or surrounding counties?

21 THE COURT: Do you live in Montgomery County?

22 MS. VENEGAS: Yes, ma'am.

23 MR. ARMANDO VENEGAS: Yes, ma'am.

24 THE COURT: Montgomery and Harris only. And,  
25 again, only for lawyer visits, work, medical treatment, and

1 mental health counseling or psychological counseling. All  
2 right.

3 MR. ARMANDO VENEGAS: I have a question, ma'am.

4 THE COURT: Yes.

5 MR. ARMANDO VENEGAS: About having the treatment  
6 inside the house --

7 MR. DOYLE: We'll work --

8 THE COURT: Yeah, if -- I mean, --

9 MR. DOYLE: We'll work on this stuff out --

10 THE COURT: Yes. I'm just saying he can't go  
11 anywhere that's not in Montgomery County or Harris County,  
12 and the only reason he can leave your home are the things I  
13 mentioned.

14 MS. VENEGAS: Yes, ma'am.

15 THE COURT: Otherwise he is in that house with no  
16 internet access, no devices, no ability to get on the  
17 internet, no ability to contact anyone over the internet,  
18 nothing.

19 MS. VENEGAS: Yes, ma'am.

20 THE COURT: Understood?

21 MS. VENEGAS: Yes.

22 THE COURT: And I should have mentioned this,  
23 Pretrial Services has the ability to come in, go through  
24 your home, announced, unannounced, and inspect everything to  
25 make sure there are no devices. Do you understand that?



1 MS. VENEGAS: Yes, ma'am.

2 MR. ARMANDO VENEGAS: Yes, ma'am.

3 THE COURT: Anything else?

4 MR. BATARSE: Your Honor, the United States would  
5 respectfully request a 24-hour stay to appeal the Court's  
6 decision on detention.

7 THE COURT: Well you're going to have to appeal it  
8 to the miscellaneous judge, I guess.

9 MR. BATARSE: Yes, Your Honor.

10 THE CLERK: Judge Tipton.

11 THE COURT: All right.

12 MR. BATARSE: Who is it?

13 THE CLERK: Judge Tipton.

14 THE COURT: Judge Tipton.

15 MR. BATARSE: Yes, Your Honor.

16 THE COURT: What's today, Tuesday?

17 MR. BATARSE: Today's Tuesday the 18th, Your  
18 Honor.

19 THE COURT: All right. So the United States is  
20 asking for 24-hour stay. I'm going to grant it because  
21 obviously there's a lot of things that would have to be done  
22 anyway so before he could return home. So they're going to  
23 appeal my decision to the miscellaneous judge. The  
24 miscellaneous judge will either accept, reject, or revise  
25 the conditions.

1 Anything else?

2 MR. BATARSE: No, Your Honor.

3 THE COURT: All right. Anything else?

4 MR. DOYLE: No, Your Honor.

5 THE COURT: I don't think we need to execute the  
6 bond paperwork until we find out if --

7 (Judge/Clerk confer.)

8 THE COURT: So, Mr. and Mrs. Venegas, you'll sign  
9 the bond paperwork here today. Mr. Venegas, your son is  
10 going to remain in custody until this is reviewed by the  
11 miscellaneous judge. And, depending on that review, he may  
12 or may not be released on the conditions that I have set out  
13 today.

14 MR. ARMANDO VENEGAS: Understood.

15 THE COURT: All right.

16 MS. VENEGAS: Thank you, ma'am.

17 THE COURT: All right. Anything else?

18 MR. DOYLE: No, Your Honor.

19 THE COURT: All right. You're all excused. Thank  
20 you.

21 MR. BATARSE: Yes, Your Honor.

22 (Proceedings adjourned at 11:28 a.m.)

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1           I certify that the foregoing is a correct  
2 transcript to the best of my ability produced from the  
3 electronic sound recording of the proceedings in the above-  
4 entitled matter.

5 /S/ MARY D. HENRY

6 CERTIFIED BY THE AMERICAN ASSOCIATION OF  
7 ELECTRONIC REPORTERS AND TRANSCRIBERS, CET\*\*337  
8 JUDICIAL TRANSCRIBERS OF TEXAS, LLC  
9 JTT TRANSCRIPT #67484

10 DATE FILED: JULY 20, 2023  
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